

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**CUSTOM DESIGNS OF NASHVILLE, INC., )  
and MAHAN MARK JANBAKHSH, )  
Plaintiffs, )  
v. )      Civil Action No. 3-08-0665  
**ALSA CORPORATION,** )      Judge Trauger  
Defendant. )      **JURY DEMAND****

**DECLARATION OF W. EDWARD RAMAGE**

Under penalty of perjury, I, W. Edward Ramage, declare as follows:

1. I am attorney of record for Defendant/Counter-Plaintiff Alsa Corporation. I am submitting this Declaration in support of the Motion to Withdraw as counsel of record in this case.
2. On December 1, 2008, I advised representatives of Alsa Corporation of the status of their account, expected expenses, and the need for my firm to receive payment to proceed with the representation.
3. On January 9, 2009, I sent an email to representatives of Alsa Corporation advising of the past-due status of their account and expected expenses to proceed with this litigation, and stating my intent to withdraw as counsel. A redacted copy of that email is attached hereto as Exhibit A.
4. On January 15, 2009, I sent a draft copy of the Motion to Withdraw and this declaration to representatives of Alsa Corporation, stating my intent to file the motion on January 19, 2009. Alsa Corporation has informed me that it understands the situation, but it cannot

afford to incur current counsel's fees as a further debt in this action. Subsequently, I received direction from Alsa Corporation to proceed with filing the motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of January, 2009, in Nashville, Tennessee.



W. Edward Ramage (TN Bar No. 16261)  
Baker, Donelson, Bearman, Caldwell & Berkowitz  
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Nashville, Tennessee 37201  
(615) 726-5771  
[eramage@bakerdonelson.com](mailto:eramage@bakerdonelson.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following counsel of record via the Electronic Case Filing system of the United States District Court for the Middle District of Tennessee to:

James R. Michels  
Melissa C. Hunter  
Stites & Harbison, PLLC  
401 Commerce Street, Suite 800  
Nashville, TN 37219

Jack A. Wheat  
Stites & Harbison, PLLC  
400 West Market Street, Suite 1800  
Louisville, KY 40202-3352

this 20th day of January, 2009.

s/W. Edward Ramage /  
W. Edward Ramage

**Ramage, W. Edward**

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**From:** Ramage, W. Edward  
**Sent:** Friday, January 09, 2009 11:27 AM  
**To:** ike; 'warren'; albert  
**Cc:** Ramage, W. Edward  
**Subject:** FW: Custom Designs v. Alsa

**REDACTED**

In order to continue our representation, the following must occur:

1. We must receive a payment of \_\_\_\_\_ by January
2. You must commit to paying us a minimum of \_\_\_\_\_ a month by the 5th of each month through July.

I understand that you may not be able to commit to the above. If so, then we will need to withdraw from the case.

Regards,

Edward

